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Attorneys for Claimant
John Hollis

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$1,200,000 IN U.S.
CURRENCY SEIZED FROM FIRST
CALIFORNIA BANK ACCOUNT NO.
2005638, ETC.,

Defendants.

Case No. CIV-S-05-0149 WBS KJM

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR CLAIM**

Plaintiff United States of America previously extended the time for Claimant John W. Hollis to file a verified claim regarding the funds at issue in this action to and including Monday, May 2, 2005. The extension was premised on an anticipated stipulation to stay the forfeiture proceeding in light of the pending criminal charges against Matthew Wallace Schachter, a.k.a., Robert Brown. The funds seized are alleged by the United States to be related to the charges against Mr. Schachter.

Due to an unexpected delay in execution of the anticipated stipulation for a stay, the due date for Mr. Hollis' claim may occur prior to execution of the stipulation for stay of the forfeiture action, and any related order from the court thereon. Therefore, the United States is providing an additional 30 day extension of time for Mr. Hollis to file a verified claim. Mr. Hollis shall file

any such claim on or before June 2, 2005. The United States and Mr. Hollis respectfully request the court adopt this stipulation as an order of the court granting Mr. Hollis an additional 30 days to file a verified claim in these forfeiture proceedings.

DATED: April 29, 2005

DOWNEY BRAND LLP

By: /S/ JEAN M. HOBLER

JEAN M. HOBLER
Attorney for Claimant
John Hollis

DATED: April 29, 2005

McGREGOR W. SCOTT
UNITED STATES ATTORNEY

By: /S/ COURTNEY J. LINN

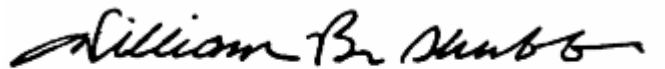
COURTNEY J. LINN
Assistant U.S. Attorney, Plaintiff

ORDER

For good cause shown, the court adopts the parties' stipulation.

IT IS SO ORDERED:

DATE: May 2, 2005



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

DOWNEY BRAND LLP